

Please review the attached procedure: RF/RMRS-99-302.UN 1/99 rev A DRAFT Closeout Report for the Source Removal at the T-1 Site IHSS 108

Title

Draft

Comment Due Date:

N/A

Number

Rev.

Internal Review

Parallel Review

Verification

Validation

Revalidation

QA Peer X

General (G) comments require resolution but do not require resolution acceptance. Mandatory (M) comments require resolution and resolution acceptance. 1-88000-PP-004 provides complete definitions of General and Mandatory comments.

ITEM G or M	PAGE	SECTION OR STEP	COMMENT	RESOLUTION	Resolution accepted INIT/DATE
G	4	2.0	General Comment - The text explains that Objective Nos. 1 and 2 were met during FY-98. Objective 1 states that "all drummed wastes were removed from the trench". This is not true if you consider the recently discovered 5 gal. Bucket. Should the 5 gal. bucket be addressed in this section?	Added "See discussion of discovery of additional container in section 5.2".	MCB 6-1-99
M	6	Table 3-2	General Comment - The column entitled "Excavated Soil" has no units. Is it Cu Ft, Cu Meters, Cu Yds?	CY is now in table	MCB 6-1-99
G	9	3.4.2, first paragraph	Based upon my recollection of August 5 incident, I believe there were two separate incidences of visual flames. One in the trench and the first one actually in a drum. There was not an immediate exit of the tent.	Changed it to two occasions → DID NOT change the exit since time since it says "Shortly after,"	MCB 6-1-99
G	17	5.0	General Comment- I suggest discussing briefly the process utilized for surveying, decontaminating, and releasing the equipment and the tent structure. The surveying of the tent I believe to be especially important information. Section 5.0 may be the most appropriate place for this information.	reference ops order	MCB 6-1-99
M	18	5.1 second paragraph	It should be noted that soil identified using the FIDLER as greater than 5,000 cpm was repackaged as LLW. This material will be shipped for offsite disposal. I believe this was documented in a restart letter.	This is documented in section 4.2.2 and 6.06.	MCB 6-1-99
G	18	5.1 third paragraph	Check the total 1434 drums.	checked OK	MCB 6-1-99
M	18	5.2	1 st paragraph- correct 1 st sentence as follows: "A two-to five-gallon metal container was discovered in the T-1 on December 18, 1998."	Added the word "excavation" after T-1 to make grammatically correct.	MCB 6-1-99

ADMIN RECORD

000074
BZ-1108-A-00074

123

M	19	5.3	<p>Please note that the soil from the stockpile has been, and will continue to be monitored (FIDLER) prior to placing in the trench. All soil identified > 5,000 cpm has been and will be placed into a waste package for waste disposal. Will this soil be characterized as LLW, RCRA, PCB waste?</p>	<p>see section 4.2.2 and 6.6</p>	<p>meB 6-1-99</p>
M	21	Table 6-1	<p>Container No. X09701 is duplicated as soil (RIN 98A2113) and debris (RIN 98A2117) waste. Container # X09701 has been classified as IDC 326 and contains both soil and debris. See attached Waste Inspection In-Process Checklist's generated for this container and classify appropriately. Container No. X09726 is duplicated as soil > 25 ppm and debris. X09726 does contain both soil and debris but should most appropriately be categorized as debris.</p>	<p>X09701 is now classified as debris only</p> <p>X09726 is now classified as just debris</p>	<p>meB 6-1-99</p>
M	23	Table 6-1	<p>Characterization is too conservative! Review the attached "In-Process Checklists", "Attachment Checklists", and "Dock Inspection Checklists". Many of the containers in the Debris category presently categorized as MLLW with F001, F002, and PCB's could and <u>should</u> be characterized as straight LLW. Categorizing all debris as RCRA/TSCA waste is unnecessary and expensive.</p>	<p>consensus has been reached to categorize as a lot</p>	<p>meB 6-1-99</p>
G	24	6.1.1 second paragraph	<p>I disagree with the text beginning with, "The sampling and analysis plan was not intended to address full characterization of individual drums.....lot was not possible." First of all, it is not clear that the SAP was not intended to characterize individual drums or containers. In fact, the SAP Section 2.1.2 states "If package contents differ visually, or have different field screening...a sample will be obtained for evaluation." Additionally, there were noted geographic waste populations within the trench (i.e. Los Alamos drums), including varying physical appearance of the material on a drum by drum basis. Characterizing the entire DU waste stream as RCRA/PCB-containing MLLW is incorrect, and unnecessarily costly.</p>	<p>same as above</p>	<p>meB 6-1-99</p>
G	25	6.1.1 fourth paragraph	<p>The statement "Therefore, it would be difficult to accurately determine VOC and PCB concentration levels in a drum based on one sample, from the drum" is inaccurate. The samples retrieved from individual containers are the best samples retrievable from each individual container. In fact, the samples taken were actually biased in order to obtain the worst case material (oils, sludge's, stains, liquids, etc.) EPA regulations only require a "representative sample" (i.e. sample of a universe or whole which can be expected to exhibit the average properties of the universe or whole). Additionally, the requirements of the SAP were met, Section 3.2.3.1 of the SAP states that "to the extent practical, the scoop or spoonful will be obtained from beneath the top surface of the exposed</p>	<p>same as above.</p>	<p>meB 6-1-99</p>

				material. Care will be taken not to use excess force when obtaining samples in order to minimize potential for ignition of any pyrophoric material." Any further intrusive sampling methods would have violated ALARA goals and increased the potential for fire, and other safety issues.			
M	25	6.1.1		Revise the last sentence of the 6 th paragraph, "Sample results for this waste stream are all contained in RIN 98A2105."		Revised	MCB 6-1-99
M	26	6.1.1		At the top of the page, correct < 0.5 Fft ³ to < 0.5 ft ³ .		Revised	MCB 6-1-99
G	26	6.1.1		Th discussion states that the DU ingot is not considered a hazardous waste because the presence of cadmium is unlikely, as the ingot is not a finished product. Can this argument also be used for the bulk of the DU waste, since the DU chips, turnings and fines are not finished products either?		?	
G	26/27	6.1.2 and 6.1.3		Characterization is too conservative. It was stated earlier in section 6.1.1 that samples could not be utilized to characterize individual drums or containers. Sections 6.1.2 and 6.1.3 are both examples of using this methodology. Additionally, the samples utilized to characterize these materials were made up of "a very small proportion of the contents". This is truly not a "representative sample". A characterization method should be utilized which enables one to average the container contents as a whole. In this case a more reasonable characterization could be performed.		Consensus has been reached on the characterization.	MCB 6-1-99
M	31	6.4		Please include in the 2 nd sentence of the first paragraph the fact that drum carcasses, lids, etc. were verified free of chips, turnings, and liquids (i.e. oils).		incorporated	MCB 6-1-99
G	31	6.5		Characterization is too conservative! It should be noted that the high readings (51 mg/kg for PCE and 16 mg/kg for Aroclor-1254) for soil > 25 ppm and (24 ug/kg for PCE and 650 ug/kg for Aroclor-1254) for soil < 25 ppm are both from the same container (sample), respectively. Sampling of containers was biased and methodology to "average" the concentrations, or eliminate those individual containers should be considered. Restart Letter WRS-048A-98 requires an approval signature.		Consensus reached on the characterization	MCB 6-1-99
M		Appendix A-2				Signed letter did not include that signature	MCB 6-1-99
M		Appendix C		The IDM drum List in Appendix C does not appear to be accurate. Verify.		Appendix appears to be correct.	MCB 6-1-99
M		Appendix D-1		Remove the key from the bottom left hand portion of the Waste Container Spreadsheets.		Now just using M. Burmaster spreadsheet directly.	MCB 6-1-99

POC/Reviewer: (Comments not signed by Reviewer/POC will be considered unofficial and not subject to resolution)

☐ No Comments

☐ This procedure revision has no impact or relevance to our discipline or organization and we waive need to concur. We acknowledge this concurrence waiver does not affect our responsibility to implement the requirements of this procedure when needed.

Mark Burmeister	<u>MC Burmeister</u>	1-27-99
Name	Signature	Date
5891/212-6228/4046	T893A/RMRS ER Projects	1/27/99
Ext./Pager/Fax	Bldg./Dept.	

Return to:

FAX	Name	Ext.	Location

If questions on content, please call the SME:

Name	Ext.

REVIEW COMMENT SHEET

Time Spent on Review 2 hrs.

Return to:

Hopi Salomon

Fax

Name

6627

Ext.

T893B

Location

Same

Name

Ext.

If you have questions on content, please call SME:

Page 1 of 3

Document No. RE/RMRS-99-302.UN, Draft Rev B

Title: CLOSEOUT REPORT FOR THE SOURCE REMOVAL AT THE TRENCH SITE IHSS 108

Comment Due Date: May 19, 1999

General (G) comments require resolution but do not require resolution acceptance. Mandatory (M) comments require resolution and resolution acceptance.

Internal Review X Parallel Review Validation

Revalidation

TYPE	PAGE	SECTION OR LINE	COMMENT	DISPOSITION	Disposition Accepted Initial/Date
G	i		Has the document been reviewed by an authorized derivative classifier, or the appropriate exemption stamp placed on the document?	- Classification from review advised per exemption # CEX-010-98.	
G	1	1.0	Where does cost summary information appear? It wasn't apparent in any section of the document.	- It is expected that the cost info, if requested will be in the document transmittal letter to EPA/DATE	
M	4	1.2	Please accurately reflect the name of Sprung Instant Structures, Inc.	- Proposed Removed ref to SPRUNG per comment from R. Cygnarowicz	
G	6	Table 3-2	Can this table be made a bit more readable? Text seems to be partially covered by the underlining.	- Will use a cut/past excel spreadsheet to represent in lieu of the word perfect table.	
G	7	Table 3-3	Please correct table formatting to eliminate blank lines where they're not needed.	- Incorporated.	
G	7	3.2	My understanding was that there were 170 drum equivalents, not necessarily 170 drums or containers. Which is more correct?	with discussions with Tracy Spence, decided to not use drum equivalents (Also got rid of the "approximately")	
G	7	3.2	Instead of referring to "approximately 130 of 160...", can we be more precise?	Incorporated - got rid of "approximately"	
G	10, bottom	3.4.2	Consider deleting reference to T900F as too much detail for the discussion.	Incorporated.	



POC/Reviewer: (Comments not signed by POC/Reviewer will be considered unofficial and not Subject to resolution)

No Comments

This procedure revision has no impact or relevance to our discipline or organization and we waive the need to concur.

R.L. Griffiths

Name

R.L. Griffiths

5/17/99

4934/212-6505/5198

Ext/Pager/Fax

T893B/South Side & ER Projects Division

Bldg./Organization

Concurrence

Name:

Z.L. Griffiths

R.L. Griffiths

Signature

6/1/99

Date

REVIEW COMMENT SHEET (CONTINUED)

Review Comments for documents: <u>RE/RMRS-99-302.JUN</u>					Rev	Rev B
Number					Draft	
TYPE G or M	PAGE	SECTION OR LINE	COMMENT	DISPOSITION	Disposition Accepted Initial/Date	
G	11	3.4.2	Consider deleting reference to T900F as too much detail for the discussion.	<i>Incorporated</i>		
G	11	3.4.2	Define "MDA" at first usage. Minimum Detectable Activity?	<i>Incorporated</i>		
G	12	4.1	Delete one of the two references to Table 4-1 depicting approximate sample locations.	<i>Table 4-1 was only referenced once, however Figure 4-1 was referenced twice in a row. One of the references was deleted.</i>		
G	12	4.1	Consider changing fifth sentence to "The analytical results indicate that for all contaminants of concern, concentrations are well below RFCA action levels, and that sum-of-ratios are less than one, which is an indicator used for evaluating risk posed ..."	<i>Incorporated</i>		
G	16	4.2	Explain why there were two stockpiles and the significance of each.	<i>Incorporated</i>		
G	20	5.2, para. 2	Revise to read "... were part of an area identified as Zone C".	<i>Incorporated</i>		
G	25	6.1.1, para. 2	Revise to read. "... breakout of DU by an identifiable lot was <u>also</u> not possible."	<i>Incorporated</i>		
G	28	6.1.2, para. 2	Revise to read "A B-12 crate (number X09823) ..."	<i>Incorporated</i>		
G	31	6.3	Is it appropriate to include a mention that the cyanide analytical technique was rejected by EPA and we're repeating these analyses?	<i>The discussion on the rejected analytical technique is in Appendix D-4. The new analysis (a reference to this) has been added to the text.</i>		
G	35	7.0	Define the term "Form-1".	<i>Incorporated</i>		
G	all	all	Please run spell check.			
POC/Reviewer: (Comments not signed by POC/Reviewer will be considered unofficial and not subject to resolution)					Concurrence	
R.L. Griffiths					<i>R.L. Griffiths</i>	<i>6/1/99</i>
Name					Signature	Date

REVIEW COMMENT SHEET (CONTINUED)

Review Comments for documents: <u>RE/RMRS-99-302.UN</u>				Rev <u> </u>	Rev B <u> </u>
Number				Draft	

TYPE G or M	PAGE	SECTION OR LINE	COMMENT	DISPOSITION	Disposition Accepted Initial/Date
✓ G	45	7.3.3	Fix font problem on 6 th bullet.	- incorporated	
✓ G	46	SVOCs	Is there a conclusion?	- incorporated	
✓ G	46	PCBs	Is there a conclusion?	- incorporated	

POC/Reviewer : (Comments not signed by POC/Reviewer will be considered unofficial and not Subject to resolution)		Concurrence	
R.L. Griffiths	<u>R.L. Griffiths</u> Signature	<u>R.L. Griffiths</u> Signature	<u>6/1/99</u> Date

Salomon, Hopi

From: Salomon, Hopi
Sent: Friday, May 21, 1999 10:41 AM
To: Brooks, Laura
Cc: Greengard, Tom; Griffis, Bob
Subject: RE: Draft T-1 Closeout Report

Laura, thanks for the input.

With respect to item #1, I have wanted to do that from the beginning. The problem is that I do not have all the data in electronic format yet (though we are close). I probably have 50+ E-mails to Analytical Services trying to get it all. The only major data set that I believe is missing is the entire PCB and SVOC data from 559. RMRS had programmers get this from 559 electronically. The data was transferred to ASD, for checks and to allow for validation qualifiers to be electronically input, but has not yet been returned to us.

With respect to item #2, it would be nice to have a complete report with respect to final waste disposition. Table 6-1 of the closeout report identifies all of the wastes that have been dispositioned to date (e.g., PPE waste to NTS on 2/3/99, Decanted lathe coolants to Bld 891 on 1/19/99, etc). Section 2.0 also references the Trench 1 Waste Characterization and Disposition Pathways Report which gives considerable insight into possible disposition. I am hoping that there is another means (other than a rev to the closeout) for addressing the final disposition of the waste as some of it (the depleted uranium) may be years out?

Thanks for your help on item #3 - Hopi, x6627.

-----Original Message-----

From: Brooks, Laura
Sent: Friday, May 21, 1999 10:16 AM
To: Salomon, Hopi
Cc: Greengard, Tom
Subject: Draft T-1 Closeout Report

Hopi,

I had a few comments to the draft T-1 Closeout Report. Overall, I thought it was very good.

1. Would it be possible to include the data referenced in the report on a disk as an appendix to the report? See, Marian Carr, x4488.
2. Because the disposition of T-1 waste has not occurred, it seems that we will need to prepare either an addendum to the report or another closeout report to address the disposition of the T-1 waste. I do not remember a reference or discussion stating this and suggest that one be added.
3. I am having Jan Robbins, RMRS Records, check the AR file to make sure that all the documents listed in the reference section are in the AR. Either she or I will contact you, if she does not find something.

If you have any questions, please contact me. LMB X6130

RMRS

P. O. Box 464,

Golden, Colorado 80402-0464

Date: 05/26/99Number of pages including cover: 3

To:

Hopi SalomanLaura BrooksKaiser-HillT130CPhone: 303-966-6130Fax phone: 303-966-5001 4046

CC:

From:

J. C. RobbinsRMRS Records ManagementCERCLA Admin RecordBuilding 116, Cube 16Phone: 303-966-2679Fax phone: 303-966-4641

REMARKS:

☐ Urgent☒ For your review☐ Reply ASAP☐ Please comment

Laura, have most of the docs - see attached list ... -J

Closure Report for the Source Removal
at the Trench-1 Site IHSS 108

Document Number: RF/RMRS-99-302.UN
Revision: B
Pages: 49

8.0 REFERENCES

- ✓ DOE, 1992, *Historical Release Report for the Rocky Flats Plant, Rocky Flats Plant, Golden, CO.* SW-A-000378 + 379
- ✓ DOE, 1995, *Phase II RPLRI Report for Operable Unit No. 2 - 909 Pad, Mound, and East Trenches Area, Rocky Flats Environmental Technology Site, Golden, CO.* 0402-A-001519 (excludes Vol. 4) May 1995
- ✓ DOE, 1996, *Final Rocky Flats Cleanup Agreement, Rocky Flats Environmental Technology Site, Golden, CO.* SW-A-002246
- NO -- BPA, 1992, *US BPA Test Methods for Evaluating Solid Waste, Solid Waste-846, third edition, Method 8260A, Rev. 1, November.*
- NO -- Grove Engineering, Inc., 1987, *RADDECAY* computer software, Rockville MD, October.
- NO -- Kaiser-Hill, 1997, *Kaiser-Hill Team Quality Assurance Program, Rev. 5, 12/97.* Rev. 3 SW-A-002750, Rev. 8 SW-A-003123
- NO -- Kuthorn, Ronald L., 1984, *Radioactivity in the Environment Sources Distribution, and Surveillance*, Harwood Academic Publishers, New York, NY., pp. 32-33.
- *
✓ RMRS, 1996a, *Draft Trenches and Mound Site Characterization Report, RF/BR-96-0044.UN, September.* (IN OFC = will get)
- ✓ RMRS, 1998a, *Final Proposed Action Memorandum for the Source Removal at Trench 1, IHSS 108, RF/RMRS-97-011, Rev 5., March.* T108-A-00015 + 00017
- ✓ RMRS, 1998b, *Field Implementation Plan for the Source Removal at Trench 1, IHSS 108, RF/RMRS-98-223, Rev 0., April.* T108-A-00043
- ✓ RMRS, 1998c, *Sampling and Analysis Plan to Support the Source Removal at the Trench T-1 Site, IHSS 108, RF/RMRS-98-205, Rev 0., April.* T108-A-00037
- NO, just page changes will get from RMRS D.C. = OK, got it ✓
✓ RMRS, 1998d, *Quality Assurance Program Description (QAPD), RMRS-QAPD-001, Rev. 2, 4/98* Rev. 1 SW-A-002752 ; Rev. 2 SW-A-002813
- NO -- RMRS, 1999a, *T-1 Waste Characterization and Disposition Pathways Analysis Report, RF/RMRS-99-303.UN, Rev 1., March.* Rev. 0 T108-A-00060

Closure Report for the Source Removal
at the Trench-1 Site IHSS 108

Document Number: RMRMS-99-302.UN
Revision: 8
Page: 50

- ✓ RMRS, 1999b, *Field Implementation Plan for Removal of the Discovered Container at Trench 1 (IHSS 108)*, RF/RMRS-99-310, Rev 0., January. SW-A-003045
- ✓ Starmet, 1998, *Starmet Sampling and Analysis Plan for the Source Removal at Trench 1 IHSS 108*, RF/RMRS-98-220, Rev 1., April. I108-A-00038

Salomon, Hopi

From: Lesser, Richard
Sent: Friday, May 21, 1999 3:45 PM
To: Salomon, Hopi
Cc: Cygnarowicz, Robert

I appreciate your patience as I put out some other brush fires on 729. Here's comments on your draft T-1 closure report.

General

The closure report takes the form of a chronological narrative. I prefer not to construct closure reports in this fashion, as a closure report in my opinion should track as follows:

- 1) general statement of pre - work site conditions, reference prior documents for detail
- 2) statement of conformance with workplan
- 3) statement of changed conditions from workplan
- 4) post - work site conditions

Although this 1) to 4) sequence has a time direction to it, it does not project as a chronological narrative. It is too easy when writing a narrative - styled closure report to (intentionally or un-intentionally) revisit the emotional highs - and - lows experienced during the project. This kind of personal statement is best reserved for the apres - work over - a - beer environment, and does not merit placement in the administrative record. *Reject*

In addition, this report uses subjective adjectives when numerical quantities would be more informative. For example, in Section 2.0, the first full paragraph uses words like "unanticipated", "widespread", and "delayed", "discovered" and my favorite word for technical reports: "encountered". Better phrasing would say "During excavation, non - conforming materials were generated." or "Remedial activities generated three (or whatever the number should be) waste streams which did not conform with initial expectations." The report could go on to say "Plans were generated to promptly characterize these materials consistent with the project ARARs and objectives." *The document has been through to much review to make these types of sweeping editorial comments*

Section 3.0 and subsections is concisely written as an essay or narrative. ✓

Section 3.4, Consider changing words like "reacted" to "responded", "unexpected" to "non-conforming", "considerable efforts ..." with "Pre - approved project plans allowed for re - assessment of non - conforming conditions, to ensure that health and safety and environmental protection safeguards were adequate. In all cases, the non - conforming materials were properly managed consistent with project ARARs."

Section 3.4.1 Since it appears clear that temperature measurements were part of the project's procedures BEFORE your first drum went pyrophoric, say so. Describe more explicitly the "changes" initiated as a result (did we change from occasional temperature monitoring to continuous?). *accepted* ✓

Section 3.4.2 I found this section fascinating reading. But, I think it would be a better submittal to the administrative record if we removed adjectives such as "quickly", "large", "proximity", etc. and replace them with numerical values, wherever possible. *great improvement, left in -*

I think we should make mention of where the tritium may have gone. The current discussion goes on at great lengths as to how this stuff ignited, and then we couldn't find any residues when we looked for 'em. *don't know -> ?*

PCBs I would submit that high concentration samples (such as lathe coolant) are not subject to degradation effects due to holding time issues. I mean, the PCBs have been in this trench for 35 years and they didn't degrade. Why would they degrade in the refrigerator in three weeks? I have some papers saying that these data are likely acceptable. *went to Rich Lesser - the data not provide*

It looks as if you have a sporadic, infrequent surrogate QC failure. Is this associated with dilution? Is it associated with organic rich samples, which can hold onto surrogate spikes like an activated charcoal sink? There has been a recent paper in ES&T describing how surrogate spikes can effectively disappear in certain kinds of samples. Why are we machine - gunning data in the discussion, then concluding that overall it's fine?

Not: the data does have numerous qualifications. However, not that have any effect on the overall outcome
VOCs *This wastewater, (in total) contains PCBs, VOC, Cd above regulatory thresholds*

Chlorinated solvent hold times can run to 30 days without bias. Do you want references? Aromatics like benzene and toluene can disappear quickly, like in 3 days. Which were our COCs here? Perc and TCE which are long - lived? Why machine gun data when they are likely A-OK.

Please remove the word "gross". It's gross. Grossly overstated. — *accepted*

7.3.7 It is redundant to start off the first sentence of a summary saying "In summary". Since I disagree with your assessment or low bias, I have to disagree with most of your second paragraph, in particular your use of the word 'thereof'.

PCBs The second sentence of this paragraph makes no sense. The third sentence makes no sense. How about this: "20 % of the PCB duplicate sample pairs yielded RPDs in excess of 35 %. However, the 35 % RPD criteria is based on metals variance in homogenized soils. It is not unexpected, then, that the heterogeneous solid wastes generated from T-1 would yield occasional exceedances. Review of all data establishes that method bias is not present. Therefore, no qualification of the data is necessary".

Anyway, sorry for the editorial rambling.

See ya'll!

Rich Lesser

I would do a nose - count of how many employees had tritium exposure versus how many did not, rather than saying "some" of the workers had uptake but "most" did not. If there is a separate health and safety close - out report, should we bring this up at all? If we do bring it up, we should state degree of exposure with reference to exposure limits. *We note that all closes in the given range (bottom of 3.4.2).*

Section 4.1 I'm afraid this section could set a precedent, saying that we were deterministic and more conservative, and possibly limit options for CERCLA approved statistical approaches in the future. I would like to think that the original plans' decision criteria were along the lines of 1) everything below action level, go home, or 2) if any single sample is above action level, use the DQO process to determine whether the SWMU population exceeds action level, then go home. this sequence is consistent with guidance. I prefer to invoke stats only when the data bracket the decision level. *Section 4.1 was overruled in accordance with the SAP*

Section 4.2.1 For all the arm waving we do about G-4 here, it looks as if in every application we then don't use it. So, since we didn't really apply the DQO process (despite the initial calculations), don't bring it up. I can show you case studies where this section's assertion that non - random stockpile samples were 'representative' was later proved incorrect. DQOs allows the introduction of project realities, i.e. since H&S wouldn't let us go up on the pile, samples from the perimeter were obtained and judgementally evaluated. State that. Avoid mention of guidance we didn't use, unless the avoidance was a workplan non - conformance or changed condition. *Revised*

Why do sometimes we use a 90 % UCL and other times a 95 % UCL? Huh? Stats are supposed to be consistent.

Table 6-1 Isn't Starmet now out of business? *The Table just references the Starmet SAP*

Section 6.1 What is the significance of transuranic isotopes at low, near detection level concentrations? *it is significant*

Section 6.1.1 Count how many times we use "widespread" in this section. Then add in a nose - count of adjectives like "extreme" and "major" "relatively low", and "consequences". Again, remove all these subjective value judgements. Substitute numerical values. *Revised*

Since we seem to have concluded that Am-241 is not present, then why do we drone on about this? Shouldn't this discussion be confined to the DQA or data validation assessment? This is the problem with the 'narrative' style to reports, we present a lot of information where the only germane issues deal with 1) conformance versus non-conformance to workplan and 2) post - work site conditions. *Revised*

The waste characterization portion of this section should simply be "This waste stream had these detects which result in this kind of regulatory implication". Period. If the sampling was biased given material heterogeneity or difficulty-in-sampling, then just say so and specify that professional judgement was used in interpretation.

Section 7.3.1 The sentence which reads "The most typical measure for nonradiological analyses is the RPD term, whereas, because of the stochastic nature of radioactivity, a statistical measure is better suited for evaluating radiological reproducibility - the DER." doesn't make sense. If RPD is used for non- rads and DER is used for RADS, then just say "RPD is used to evaluate reproducibility, or precision, for non - rad tests and DER is used to evaluate reproducibility, or precision, for RAD tests." *Revised to account*

Readability of this section over - all is hampered by the fact that the reference criteria (such as 35 % RPD, or matrix spike per cent recovery between 80 - 120 %) are not presented. Granted the reference documents are cited (such as the CLP SOW), but the text does not present enough information to allow the reader to agree with your conclusions. For instance, if only 20 % of samples exceed a 35 % RPD, that statement is succinct and allows the reader to conclude that this exceedance is relatively minor. Similarly, if TCLP cadmium has 75 % of its duplicate pairs above 35 %, and the RPD ranges to 80 %, then the reader can conclude that the cadmium data are suspect rather than trusting the author's opinion.

REVIEW COMMENT SHEET

Please review the attached procedure: RE/RMRS-99-302.UN Rev B May, 1999
 CLOSEOUT REPORT FOR THE SOURCE
 REMOVAL AT THE TRENCH-1 SITE IHSS 108
 Title

Comment Due Date: May 19, 1999

Number Rev. Draft

☐ Internal Review
 ☐ Parallel Review
 ☐ Verification
 ☐ Validation
 ☐ Revalidation

General (G) comments require resolution but do not require resolution acceptance. Mandatory (M) comments require resolution and resolution acceptance. 1-88000-PP-004 provides complete definitions of General and Mandatory comments.

ITEM G or M	PAGE	SECTION OR STEP	COMMENT	RESOLUTION	Resolution accepted INIT/DATE
M G	5	Table 3-1	Break the 4 columns in-to 2 of 2 - it looks confusing to read	Accepted, done.	9/08/11/99
M	7	3.2	The word "approximately" shouldn't be used since we have a final count on all drums removed from the Trench. Include the 5 gallons containers removed from the trench after the initial closure	Accepted	9/08/11/99
M	9	3.4.2 P 3	The Date August 5, 1999, hasn't happened yet.	Changed to August 5, 1998 - the correct date.	9/08/11/99
G	20	5.2	Clarify the type of geophysical survey for the reader	The 2 types of geophysical survey performed were added - Accepted	9/08/11/99

POC/Reviewer: (Comments not signed by Reviewer/POC will be considered unofficial and not subject to resolution)

☐ No Comments
☐ This procedure revision has no impact or relevance to our discipline or organization and we waive need to concur. We acknowledge this concurrence waiver does not affect our responsibility to implement the requirements of this procedure when needed.

Greg D. Gregorio
 Name
 5/10/99
 Ext./Pager/Fax
 TB93B / 6A
 Bldg./Dept./AGM-
 Date
 5/10/99

Return to:
 4046 Hopi Salomon 966-6627 T893B
 FAX Name Ext. Location

If questions on content, please call the SME:
 Hopi Salomon 966-6627
 Name Ext.

Review comments for document: BE/RMRS-99-302.UN					Draft B		May, 1999		Draft	
					Rev.					
ITEM G or M	PAGE	SECTION OR STEP	COMMENT	RESOLUTION	Resolution accepted INIT/DATE					
G	35	7.0	Explain what "Form 1" data is (i.e., unvalidated/unfinal data)	added "unvalidated laboratory results sheets" to the section after "Form 1" Data.	ADD 4/1/99					
M	40?	Table	Format the Table ; include Header.	- Accepted	ADD 4/1/99					
M	41		If no MS/MSD samples for VOCs were performed by the lab, is this data rejected? What impacts does this have on the final boundary samples? Were these all boundary samples from the trench - 1?	MS/MSD was performed on a 1-cb batch rate, not a regular SDG ordered by the customer. Text was modified to discuss these details	ADD 4/1/99					
M	47	7.3.4	The "completeness good" for the project was 90%. Did the project attain 90% completeness - 90% of the data is usable? Clarify.	Accepted, yes project met 90% - test modified to reflect.	ADD 4/1/99					
M	48	7.3.7	The last paragraph is vague. Did the project meet the DAOs as prescribed? If not, why not and explain	He wrote with the help of Steve Lohr.	ADD 4/1/99					

POC/Reviewer: (Comments not signed by the Reviewer/POC will be considered as unofficial comments)		Resolutions Accepted	
Greg DiGregorio Name	Signature	ADD Initials	6/1/99 Date

REVIEW COMMENT SHEET

Please review the attached procedure: RE/IRMRS-99-302.UN Rev B May, 1999 CLOSEOUT REPORT FOR THE SOURCE REMOVAL AT THE TRENCH-1 SITE IHSS 108

Comment Due Date: May 19, 1999 Number Draft Title

☐ Internal Review
 ☒ Parallel Review
 ☐ Verification
 ☐ Validation
 ☐ Revalidation

General (G) comments require resolution but do not require resolution acceptance. Mandatory (M) comments require resolution and resolution acceptance. 1-88000-PP-004 provides complete definitions of General and Mandatory comments.

ITEM G or M	PAGE	SECTION OR STEP	COMMENT	RESOLUTION	Resolution accepted INIT/DATE
M	3/15	Figure 4-1	Identical Maps exist in this document (Fig. 4-1). Eliminate one of the maps.	Indecent mistake during collation - fixed.	MCB 6-1-99
M	22-24	Table 6-1	See attached. Hopi, our container numbers still do not "give". It would be easiest if we can sit down together and agree on the waste categories & container IDs!	- Incorporated fix w/ M. Burmeister	MCB 6-1-99
G			I did only a very quick review of the text; my major comment is Table 6-1. Also, please review my previous comments (attached); dated Jan. 27, 1999.	- incorporated	MCB 6-1-99

POC/Reviewer: (Comments not signed by Reviewer/POC will be considered unofficial and not subject to resolution)

- ☐ No Comments
- ☐ This procedure revision has no impact or relevance to our discipline or organization and we waive need to concur. We acknowledge this concurrence waiver does not affect our responsibility to implement the requirements of this procedure when needed.

Mark Burmeister
 Name Mark Burmeister
 Signature MC Burmeister
 Date 5-18-99
 Ext./Pager/Fax 5891/210-6228
 Bldg./Dept./AGM T893B - Closure Projects (T-1)

Return to:
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 Hopi Salomon
 966-6627
 I893B
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 Ext.

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 Hopi Salomon
 966-6627
 Ext.

REVIEW COMMENT SHEET (continued)

Review comments for document: BE/BMBS-99-302.UN

Number

Draft B
Rev.

May 1999
Draft

ITEM G or M	PAGE	SECTION OR STEP	COMMENT	RESOLUTION	Resolution accepted INIT/DATE

POC/Reviewer: (Comments not signed by the Reviewer/POC will be considered as unofficial comments)

Resolutions accepted

mcB

Initials

6-1-99

Date

Name

Signature

Date

REVIEW COMMENT SHEET

Please review the attached procedure: RE/RMRS-99-302.UN Rev B May, 1999 CLOSEOUT REPORT FOR THE SOURCE REMOVAL AT THE TRENCH-1 SITE IHSS 108

Number _____ Title _____

Rev. _____ Draft _____

Comment Due Date: May 19, 1999

☒ Internal Review ☐ Parallel Review ☐ Verification ☐ Validation ☐ Revalidation

General (G) comments require resolution but do not require resolution acceptance. Mandatory (M) comments require resolution and resolution acceptance. 1-88000-PP-004 provides complete definitions of General and Mandatory comments.

ITEM G or M	PAGE	SECTION OR STEP	COMMENT	RESOLUTION	Resolution accepted INIT/DATE
G			Editorial comments provided. All General.		MAD/6/3/99

POC/Reviewer: (Comments not signed by Reviewer/POC will be considered unofficial and not subject to resolution)

☐ No Comments

☐ This procedure revision has no impact or relevance to our discipline or organization and we waive need to concur. We acknowledge this concurrence waiver does not affect our responsibility to implement the requirements of this procedure when needed.

Tracey A. Spence Name TRACEY SPENCE Signature

Return to: 4046 Hopi Salomon 966-6627 1893B
FAX Name Ext. Location

If questions on content, please call the SME:
Hopi Salomon 966-6627
Name Ext.

Ext./Pager/Fax _____ Bldg./Dept./AGM _____ Date _____

REVIEW COMMENT SHEET

Please review the attached procedure: RE/RMRS-99-302.UN May 1999 Rev B May 1999 CLOSEOUT REPORT FOR THE SOURCE REMOVAL AT THE TRENCH-1 SITE IHSS.108

Title

Draft

Rev.

Number

Comment Due Date: May 19, 1999

☒ Internal Review

☐ Parallel Review

☐ Verification

☐ Validation

☐ Revalidation

General (G) comments require resolution but do not require resolution acceptance. Mandatory (M) comments require resolution and resolution acceptance. 1-88000-PP-004 provides complete definitions of General and Mandatory comments.

ITEM G or M	PAGE	SECTION OR STEP	COMMENT	RESOLUTION	Resolution accepted INIT/DATE
G			Editorial comments provided directly on copy of document.		RMC

POC/Reviewer: (Comments not signed by Reviewer/POC will be considered unofficial and not subject to resolution)

☐ No Comments

☐ This procedure revision has no impact or relevance to our discipline or organization and we waive need to concur. We acknowledge this concurrence waiver does not affect our responsibility to implement the requirements of this procedure when needed.

Robert Cygnarwick

Name

Signature

7916/6512/5193

Ext./Pager/Fax

T893B/RMRS ER/Law

Bldg./Dept./AGM

5/18/99

Date

Return to:

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If questions on content, please call the SME:

Hopi Salomon

Name

966-6627

Ext.

OTE: These reviews will be completed by qualified reviewers in accordance with 1-88000-PP-004 in concert with 1-88000-PP-001 and 1-88000-PP-003.

REVIEW COMMENT SHEET

Please review the attached procedure: BF/BMRS-99-302.UN Rev B May, 1999
CLOSEOUT REPORT FOR THE SOURCE REMOVAL AT THE TRENCH-1 SITE IHSS 108
Comment Due Date: May 19, 1999 Number Rev. Draft
Title

☐ Internal Review ☐ Parallel Review ☐ Verification ☐ Validation ☐ Revalidation

General (G) comments require resolution but do not require resolution acceptance. Mandatory (M) comments require resolution and resolution acceptance.
-88000-PP-004 provides complete definitions of General and Mandatory comments.

ITEM or M	PAGE	SECTION OR STEP	COMMENT	RESOLUTION	Resolution accepted INIT/DATE

OC/Reviewer: (Comments not signed by Reviewer/POC will be considered unofficial and not subject to solution)
No Comments
This procedure revision has no impact or relevance to our discipline or organization and we waive need to incur. We acknowledge this concurrence waiver does not affect our responsibility to implement the requirements of this procedure when needed.

Return to: 4046 Hopi Salomon 966-6627 1893B
FAX Name Ext. Location

If questions on content, please call the SME:
Hopi Salomon 966-6627
Name Ext.

Wayne Sparrow 586 Closure Proj. 5/19/99
Name Bldg./Dept./AGM Date
5860/112-5051 Ext./Pager/Fax

[E: These reviews will be completed by qualified reviewers in accordance with 1-88000-PP-004 in concert with 1-88000-PP-001 and 1-88000-PP-003.

Salomon, Hopi

From: Castaneda, Norma
Sent: Monday, June 28, 1999 8:49 AM
To: Salomon, Hopi
Cc: Griffis, Bob; Greengard, Tom; Butler, Lane
Subject: RE: Comments on T-1 Closeout Report

Hopi: Rick's copy of the T-1 closeout report had only 1 page and I had 4 pages. That was the mix up. I'll let him know. And, no, don't have any other comments. Thanks, Norma

From: Hopi Salomon/RFFO1/USDOE@EXCHANGE on 06/28/99 08:45 AM
To: Norma Castaneda/AMEC/DMTP/rffo@RFFO
cc: Bob Griffis/RFFO1/USDOE@EXCHANGE, Tom Greengard/RFFO1/USDOE@EXCHANGE, Lane Butler/RFFO1/USDOE@EXCHANGE
Subject: RE: Comments on T-1 Closeout Report

Norma, I just added the IDM list contained in Appendix C and compared it with the 1434 drums noted in Section 5.1. First, I hope you/Rick got the entire list in appendix C (it is four pages long). The first 3 pages each contain 9 columns with 50 rows. The last page contains 84 wems #'s. Therefore $3(9 \times 50) + 84 = 1434$ wems-drum #'s. Let me know if I should expect any other comments. Thanks, Hopi

-----Original Message-----

From: Castaneda, Norma
Sent: Monday, June 28, 1999 7:55 AM
To: Salomon, Hopi
Cc: Griffis, Bob; Spence, Tracey; Luker, Steve
Subject: RE: Comments on T-1 Closeout Report

Hopi: Answer is fine. I have one more comment from Rick DiSalvo. In Appendix C, regarding the list of IDM drums backfilled in T-1, is this the complete list? He says it seems too short per 5.1, used 1,434 drums. Thanks, Norma

From: Hopi Salomon/RFFO1/USDOE@EXCHANGE on 06/24/99 03:50 PM
To: Norma Castaneda/AMEC/DMTP/rffo@RFFO
cc: Bob Griffis/RFFO1/USDOE@EXCHANGE, Tracey Spence/RFFO1/USDOE@EXCHANGE, Steve Luker/RFFO1/USDOE@EXCHANGE
Subject: RE: Comments on T-1 Closeout Report

Norma, believe it or not the value presented is the correct variance value (essentially it's the standard deviation squared). As Scott Surovchak pointed out, the variance is so large that it looks like a sum value, but it is the correct variance. Steve Luker and I both re-calculated it. Also, as is noted on one of the footnotes to the table, a duplicate sample was used in place of the "real" sample for conservatism purposes. This causes the variance to go from 189 to the stated 402 pCi/g value. Let me know if I can answer any more questions. Thanks - Hopi

-----Original Message-----

From: Spence, Tracey
Sent: Thursday, June 24, 1999 2:33 PM
To: Salomon, Hopi
Cc: Griffis, Bob
Subject: FW: Comments on T-1 Closeout Report

-----Original Message-----

From: Castaneda, Norma
Sent: Thursday, June 24, 1999 2:24 PM
To: Spence, Tracey
Subject: Re: Comments on T-1 Closeout Report

Tracey: The document is good. It seems we only have one comment enclosed below from Scott Surovchak. I had none. I haven't received comments from Rick DiSalvo, our attorney. I probably won't get any from him until Monday. Thanks, Norma

----- Forwarded by Norma Castaneda/AMEC/DMTP/rffo on 06/24/99 02:26 PM -----

<< OLE Object: Picture (Device Independent Bitmap) >>

Scott Surovchak
06/24/99 01:24 PM

To: Norma Castaneda/AMEC/DMTP/rffo@RFFO
cc:
Subject: Re: Comments on T-1 Closeout Report << File: Norma Castaneda >>

The only comment I have so far:

Page 18, Table 4-3. The values in the variance row for U-234 and U-238 are closer to totals than a variance.

Scott

<< OLE Object: Picture (Device Independent Bitmap) >>

To: Richard DiSalvo/OCC/rffo@RFFO, Scott Surovchak/AME/DMTP/rffo@RFFO
cc:
Subject: Comments on T-1 Closeout Report

FYI. Any comments on the Trench 1 Closeout Report? Need them. Thanks, Norma